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UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION

TANYA GERSH,

Plaintiff,

vs.

ANDREW ANGLIN, publisher of
the *Daily Stormer*,

Defendant.

Case No.: 9:17-cv-00050-DLC-JCL

**PLAINTIFF’S MOTION TO ENTER
PROTECTIVE ORDER
GOVERNING “CONFIDENTIAL”
AND “HIGHLY CONFIDENTIAL”
INFORMATION**

Pursuant to Rule 26(c)(1) of the Federal Rules of Civil Procedure Plaintiff respectfully moves this Court for a protective order to protect from public disclosure information produced pursuant to discovery designated as

“CONFIDENTIAL” and “HIGHLY CONFIDENTIAL.” The grounds for this Motion are as follows:

1. Defendant is the founder and editor of the neo-Nazi website, Daily Stormer, a national and international forum dedicated to spreading anti-Semitism, neo-Nazism, and white nationalism;
2. Defendant uses his website to intimidate and harass groups and individuals who hold beliefs non-aligned with his own, whom he maligns and describes as “Kikes,” “Zionists,” “Judeo-Bolsheviks,” “Third Worlders,” “Negroes,” “Savage Negroids,” “Porch Monkeys,” “Moslem Pigs,” and “Hebes,” among other maligning descriptions;
3. Defendant frequently targets individuals for harassment by publishing and widely disseminating their names, personal information, documents, contact information, photographs (including manipulated photographs superimposed onto violent and disturbing images and accompanying quotations), and other material to assist him in his efforts to humiliate and harass non-adherents and to foment division between races and genders.
4. Given Defendant’s *modus operandi* as described above and as is publicly available,¹ Plaintiff seeks to protect from dissemination contact

¹ See, e.g., “Andrew Anglin’s Daily Stormer” website, available at <https://dailystormer.name/>; Wikipedia: The Daily Stormer, available at https://en.wikipedia.org/wiki/The_Daily_Stormer; Rational Wiki: Daily Stormer,

information of third parties subject to harassment, information about, and images of, her minor children, and certain private, sensitive and confidential information about herself.

5. Despite exchanging proposed stipulated protective orders, the Parties were unable to agree on the scope of the protective order to be entered.

6. This motion is accompanied by a memorandum of law and a proposed Protective Order.

7. Plaintiff has contacted counsel for all parties to discuss the filing of this motion. Defendant opposes Plaintiff's version of the proposed Protective Order, as set out in Plaintiff's brief in support of this motion. Intervenor has no objection.

For the foregoing reasons, Plaintiff requests this Court enter a Protective Order Governing "Confidential" and "Highly Confidential" Information.

DATED: February 11, 2019.

/s/ Elizabeth Littrell
Attorney for Plaintiff Tanya Gersh

available at Rational Wiki, https://rationalwiki.org/wiki/The_Daily_Stormer; Will Carless and Aaron Sankin, *The Hate Report: The Nazis are coming for your children* (January 19, 2018), available at <https://www.revealnews.org/blog/the-hate-report-the-nazis-are-coming-for-your-children/>; Luke Obrien, *The Making of an American Nazi* (Dec. 2017), available at <https://www.theatlantic.com/magazine/archive/2017/12/the-making-of-an-american-nazi/544119/>

on behalf of all Attorneys for Plaintiff.

CERTIFICATE OF SERVICE

I hereby certify that on this date the foregoing document was filed through the Court's CM/ECF filing system, and by virtue of this filing notice will be sent electronically to all counsel of record, including:

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on this 11th day of February, 2019.

/s/ Elizabeth Littrell

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